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E-MAIL ADDRESS:
WRITER'S DIRECT DIAL:

RECEIVED

May 5, 2006

MAY 08 2006

PUBLIC SERVICE
COMMISSION

Beth A. O'Donnell, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

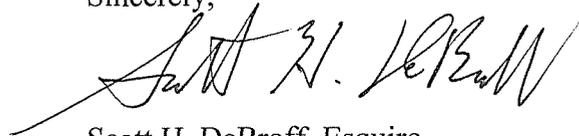
RE: **Case No. 2006-00045 Expedited Petition To Intervene of
Cellnet Technology, Inc. and Hunt Technologies, Inc.**

Dear Ms. O'Donnell:

Please find enclosed the original and ten (10) copies of the Petition to Intervene of Cellnet Technology, Inc. and Hunt Technologies, Inc. in the above-referenced matter. Cellnet and Hunt request expedited review of the Petition in order to participate as an active party at the May 10th Informal Conference at the KPSC.

By copy of this letter, all parties listed on the attached Certificate of Service have been served. Please place these documents on file.

Sincerely,



Scott H. DeBroff, Esquire
Counsel for Cellnet Technology, Inc.
and Hunt Technologies, Inc.

SHD/bla

Cc: Certificate of Service

BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

MAY 08 2006

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:
CONSIDERATION OF THE REQUIREMENTS
OF THE FEDERAL ENERGY POLICY ACT
OF 2005 REGARDING TIME-BASED
METERING, DEMAND RESPONSE, AND
INTERCONNECTION SERVICE

CASE NO. 2006-00045

PETITION TO INTERVENE
OF
CELLNET TECHNOLOGY, INC. AND HUNT TECHNOLOGIES, INC.

AND NOW COMES **Scott H. DeBroff, Esquire** of LeBoeuf, Lamb, Greene & MacRae LLP, on behalf of his clients, **Cellnet Technology, Inc. ("Cellnet")** and **Hunt Technologies, Inc. ("Hunt")** for the purpose of this "Petition For Full Intervention" with respect to the proceedings of the Kentucky Public Service Commission ("KPSC" or the "Commission") regarding this proceeding to permit the Commission to consider the requirement of the Federal Energy Policy Act of 2005 regarding time-based metering, demand response and interconnection service and, with respect, avers the following:

1. Cellnet Technology, Inc. ("Cellnet") is a party interested in the above-captioned docket as it is a meter technology provider which has participated extensively in rulemaking proceedings in other states involving the implementation of the Energy Policy Act of 2005, specifically the Smart Metering and Demand Response provisions beginning at Section 1252 of the Electricity Title of the Act.

2. Cellnet Technology, Inc., with its headquarters in Atlanta, Georgia, supplies natural gas, water, and electric utilities with highly reliable, field-proven products that enable them to communicate with residential and commercial and industrial (C&I) meters using wireless and IP network communications.

3. Hunt Technologies Inc. ("Hunt") is also a party interested in the above-captioned docket as it is a meter technology provider which has participated extensively in rulemaking proceedings in other states involving the implementation of the Energy Policy Act of 2005 as well.

4. Hunt Technologies Inc., with its international headquarters in Pequot Lakes, Minnesota, provides electric, water, and natural gas automated meter reading systems for Investor-Owned Utilities, Rural Electric Cooperatives, and Municipal Governments.

5. Hunt and Cellnet have been involved extensively in a number of EPACT related smart metering proceedings across the country before other state public utility commissions. Our interest in intervening in this proceeding is to inform and educate the Commission on the issues of smart metering technology and demand response and the value to both utilities and customers.

6. Cellnet and Hunt have a substantial and bona fide interest in the subject matter of this docket and their interests cannot be represented or protected adequately by other existing parties to this docket.

7. Cellnet and Hunt intend to play a constructive role in the Commission's decision-making process herein and their participation will not unduly prejudice any party.

8. Cellnet and Hunt respectfully request that their "Petition for Full Intervention" be given expedited review and that they be granted full party status in this case and placed on the Commission's Official Service List for this docket.

9. All communications and pleadings in this docket should be directed to:

Scott H. DeBroff, Esquire
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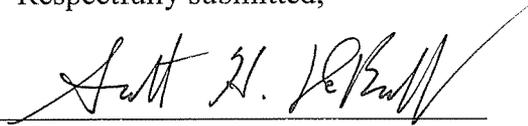
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WHEREFORE, Cellnet and Hunt request that they be granted Full Intervenor Status in the above captioned proceeding.

Respectfully submitted,

Dated: **May 5, 2006**

By: _____


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**Counsel for Cellnet Technology, Inc. and
Hunt Technologies, Inc.**

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:
CONSIDERATION OF THE REQUIREMENTS
OF THE FEDERAL ENERGY POLICY ACT
OF 2005 REGARDING TIME-BASED
METERING, DEMAND RESPONSE, AND
INTERCONNECTION SERVICE**

CASE No. 2006-00045

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent by U.S. First Class mail, facsimile, electronically or hand delivery, to all parties of record in this proceeding:

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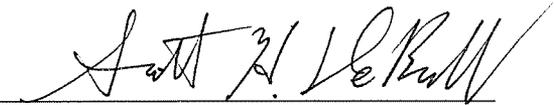
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Dated: **May 5, 2006**

Respectfully submitted,

By: 

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